

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES

V.

CR. NO. 04-10288-RWZ

JOSEPH BALDASSANO

DEFENDANT'S MOTION TO MODIFY CONDITIONS OF RELEASE

Defendant Joseph Baldassano, by his attorney, moves that this Court modify his conditions of release to permit him to take a vacation with his parents and sister.

Defendant's sister proposes to take the family to Las Vegas departing Boston on March 19 and returning on March 23, 2006.

If permitted to travel, defendant will provide his pretrial services officer with a specific flight schedule and location where he will be staying.

JOSEPH BALDASSANO
By his attorney,

/s/ Elliot M. Weinstein
Elliot M. Weinstein
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January 24, 2006